U.S. ENVIRONMENTAL PROTECTION AGENCY POLLUTION/SITUATION REPORT HOVENSA DCU Vapor Release - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Region II

Subject: POLREP #2

HOVENSA DCU Vapor Release

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Christiansted, VI

Latitude: 17.7078390 Longitude: -64.7466520

To:

From: Cris Donofrio, On Scene Coordinator

Date: 12/16/2010

Reporting Period: 12/12/10 - 12/20/10

1. Introduction

1.1 Background

Site Number: A263 Contract Number: D.O. Number: Action Memo Date:

Response Authority: CERCLA Response Type: Emergency

Response Lead: PRP Incident Category: Removal Assessment

NPL Status: Non NPL Operable Unit:

Mobilization Date: 12/10/2010 **Start Date:** 12/9/2010

Demob Date: Completion Date:

CERCLIS ID: VID980536080 RCRIS ID:

ERNS No.: State Notification:

FPN#: Reimbursable Account #:

1.1.1 Incident Category

Emergency Response

1.1.2 Site Description

Release of vaporized coker intermediate to the atmosphere. Fallout from the release impacted cars, structural surfaces and potentially residential cisterns.

1.1.2.1 Location

1 Estate Hope

Christiansted, St Croix, US Virgin Islands

1.1.2.2 Description of Threat

Coker residue fallout potentially impacting residential cisterns.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Approximately 220 homes/other structures, one school, one daycare and several businesses affected by the release.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

EPA continues participation in the Unified Command for this response with the VIDPNR, VIDOH, and HOVENSA. EPA has mobilized two members of the United States Coast Guard (USCG) Atlantic Strike Team (AST) and the EPA RST contractor to assist in technical oversight of HOVENSA operations and to conduct split, representative sampling of cisterns as needed. Throughout this reporting period, HOVENSA continued it's efforts in conducting the following activities:

- further assessment of the impact zone;
- · disconnection of potentially impacted cisterns;
- representative sampling of potentially impacted cisterns;
- cleaning of roofs and other structures/surfaces as required;
- issuance of car vouchers for cleaning of impacted vehicles;
- · drinking water distribution; and
- continuation of public outreach.

EPA has also initiated pulbic outreach efforts. A press release was issued on 12/15/2010 that included a formal statement from the Regional Administrator.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The potentially responsible party (PRP) is HOVENSA.

2.1.4 Progress Metrics

EPA has worked within the Unified Command to ensure that the statistical sampling approach proposed by HOVENSA would be adequate to address the potential contamination in the cisterns. The EPA Environmental Response Team (ERT) has provided technical guidance to ensure the statistical validity of the sampling effort. EPA ERT has also provided guidance on the analytical approach to be used by EPA in fingerprint and constituent analyses to substantiate whether the material released from the coker has actually entered cisterns. HOVENSA will be conducting their own fingerprint analysis; EPA has split approximately 50% of the samples with HOVENSA for analysis by the ERT SERAS contractor lab in Edison, NJ. EPA analytical results will be used to confirm analytical data resulting from the HOVENSA sampling effort.

Unified Command, as of 12/17/10, has ramped up field operations and is targeting completion of roof cleaning by 12/26/10. Cistern cleaning will be on hold until conclusions are drawn from the analytical results for samples collected thus far.

HOVENSA currently has the specified number of teams conducting the following operations:

- 4 Roof Assessement Teams performing roof, structure and car inspections to determine the need for cleaning, verify the plume boundaries, distribute car vouchers and perform community outreach.
 During the period 12/13/10 through 12/17/10, these teams were also collecting cistern samples as directed by Unified Command. Representative sampling was completed and a total of 45 samples were collected as of C.O.B 12/17/10. Analytical results are pending.
- 3 roof cleaning teams are cleaning roofs that were designated as impacted via visual inspection. Unified Command is considering that any visual contamination will require roof cleaning regardless of extent of coverage.

- 1 "Hot Shot Team" is being used to inspect homes/roofs for impact in response to complaints recieved from the HOVENSA hotline and assist in confirming the current plume boundaries.
- 2 water distribution teams have been established in the Clifton Hill area to service the entire
 impact area and provide drinking water to area residents. The distribution teams are being
 maintained at the Original Pentecostal Chruch and the St. Croix Animal Shelter in Clifton Hill.
 Drinking water was previously being distributed by providing bottled water. Water buffalos (tanks)
 were set up to recieve WAPA water. The tanks were installed with carbon filtration systems to
 remove chlorine and improve taste. These systems have been approved by DPNR and are now
 on-line and being used to provide water distribution.
- 1 Cistern Reconnection Team is following the roof cleaners to reconnect cisterns at impacted residences as soon as roof cleaning is complete. Cisterns are being reconnected as quickly as possible to satisfy complaints from area residents that they are missing critical replenishment from new rainfall events. Information is being distributed to instruct residents that they are not to use cistern water until further notice, regardless of whether reconnection has been made.

Cisterns were not disconnected at some residents for various reasons including:

- the resident stated that no cistern exists on the property;
- the resident refused disconnection because no coker residues were observed by the resident;
- the resident refused disconnection because they said that the cisterns are not used for drinking,
- the resident(s) refused disconnection because the resident(s) is (are) angry at Hovensa; or
- no one was home at the time of contact.

HOVENSA is continuing public outreach in an effort to gain better cooperation with resistant residents and to ensure contact is made with those residents that were not present at the time of initial contact.

Roof cleaning was completed at Central High School on 12/12/10. The air conditioning systems/filters were inspected on 12/13/10 and found to be unimpacted by the release. Additionally, the The Estate Blessing playground was cleaned by 12/12/10.

The following are totals to date as of 0900 hours on 12/20/10:

- 1. No. of roofs inspected: 236
- 2. No. of Roofs Impacted: 168
- 3. No. of Roofs Cleaned: 84
- 4. No. of Cisterns Sampled: 45
- 5. No. of gallons water distributed: 2,569
- 6. Car Wash Vouchers Issued: 118; 43 were cleaned
- 7. Calls Received at the call center: 82

1.

1.

As of 12/15/10, the latest reports from the hospital to ATSDR had indicated that forty six patients were treated on 12/9/10 and thirty six patients (some were return patients) were treated on 12/10/10 at the hospital emergency room with symptoms that were allegedly related to this incident. Previous statements released to the newspaper that there were 200 or more patients seeking treatment have not been substantiated and are beleived to be mistaken. VIDOH is working with the local hospitals and doctors to substantiate these claims.

2.2 Planning Section

2.2.1 Anticipated Activities

Roof cleaning operations are targeted for completion by 12/26/10. Completion of vehicle cleaning is targeted for 12/31/10.

Analytical results for some samples date are expected by early the week of 12/27/10.

2.2.1.1 Planned Response Activities

EPA has integrated into and will participate in Unified Command for this response. EPA will also:

- · provide oversight of PRP assessment and cleanup activities, and
- collect and analyze split samples of cisterns with HOVENSA.
- evaluate analytical results to determine impact to cisterns.
- · continue public outreach.

2.2.1.2 Next Steps

Continue roof cleaning and assessment activities.

Evaluate analytical results as received to determine impact to cisterns.

2.2.2 Issues

2.3 Logistics Section

Researching/identifying additional cleaning solution (Simple Green) required to sustain operations.

2.4 Finance Section

2.4.1 Narrative

N/A

2.5 Other Command Staff

2.5.1 Safety Officer

All operations will conform to the following regulations:

Title 29, Part 1910 of the Code of Federal Regulations, Occupational Safety and Health Standards (with special attention to Section 120, Hazardous Waste Operations and Emergency Response)

Title 29, Part 1926 of the Code of Federal Regulations, Safety and Health Regulations for Construction

National Institute for Occupational Safety and Health / OSHA / USCG / EPA Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities

2.6 Liaison Officer

N/A

2.7 Information Officer

2.7.1 Public Information Officer

The EPA Public Affairs Division PAD is being regularly updated on response oversight efforts. A statement from the Regional Administrator was released on 12/15/10. Positive response was recieved from the press/community in regards to this statement and the EPA oversight effort.

2.7.2 Community Involvement Coordinator

N/A

3. Participating Entities

3.1 Unified Command

HOVENSA

VI DPNR VI TEMA US EPA

3.2 Cooperating Agencies

ATSDR has been contacted for assistance by DOH and EPA. ATSDR will be assisting as needed to evaluate the potential health effects via inhalation and ingestion pending constituent analysis of coker product samples.

4. Personnel On Site

EPA OSCs 1
HOVENSA 68 + (varies)
VI DPNR 1
VI DOH 1

5. Definition of Terms

N/A

6. Additional sources of information

6.1 Internet location of additional information/report

US Coast Guard - National Pollution Fund Center http://www.uscg.mil/npfc/default.asp

US Environmental Protection Agency - Region 2 http://www.epa.gov/Region2/

6.2 Reporting Schedule

Weekly

7. Situational Reference Materials

N/A